

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-30004-MAP
)	
ROOSEVELT ARCHIE,)	
Defendant.)	
)	

THE GOVERNMENT'S MOTION FOR AN ORDER OF EXCLUDABLE DELAY
(Assented to)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves for an order of excludable delay under the Speedy Trial Act, 18 U.S.C. §3161. In support of this motion, the government states that Counsel for Defendant, Attorney Vincent Bongiorno, requests further time to meet with the Defendant to discuss the Defendant's likely change of plea. The undersigned Assistant U.S. Attorney and Attorney Bongiorno have engaged in plea negotiations, and ON July 8, 2005, the Defendant proposed an amendment to the plea agreement. The parties request additional time to evaluate the proposed change to the plea agreement. The Defendant has assented to this motion to exclude the time from July 11, 2005, until the July 18, 2005.

It is in the best interests of the Defendant, the government, and the public, to exclude the time from July 11, 2005 until July 18, 2005, from the period withing which the trial of this case must commence under the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul Hart Smyth

Paul Hart Smyth
Assistant U.S. Attorney

Dated: July 11, 2005

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
July 11, 2005

I, Paul Hart Smyth, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by mail to Attorney Vincent Bongiorno, 95 State Street, Springfield, MA.

S/ Paul Hart Smyth
Paul Hart Smyth
Assistant U.S. Attorney